Remarks

Reconsideration of this application as amended is respectfully requested.

Claims 1-21 stand rejected under 35 U.S.C. §103(a) as being unpatentable over U.S. Patent No. 6,182,227 of Blair et al. ("Blair") and U.S. Patent No. 6,654,892 of Karim ("Karim") and U.S. Patent No. 5,819,110 of Motoyama ("Motoyama").

Claim 17 is cancelled.

Applicant respectfully submits that amended claim 1 is not obvious in view of Blair and Karim and Motoyama because Blair and Karim and Motoyama do not disclose or suggest using an email message to invoke the program code of a service on a set of computing resources in a device as claimed in amended claim 1. Instead, Blair discloses sending an access request to a web site using HTTP commands (Blair, col. 1, lines 11-25 and col. 3, line 65 through col. 4, line 5) and Karim discloses accessing a document using an email message (Karim, Abstract and col. 3, lines 18-27) and Motoyama discloses sending commands to a business machine using an email message (Motoyama, Abstract and col. 11, line 45 through col. 12, line 58).

The examiner has acknowledged that Blair and Karim do not disclose loading and running a service on computing resources (page 3, lines 16-18, Office Action, 6-28-05) but has stated that Motoyama discloses loading and running a service on computing resources (page 4, lines 1-3, Office Action, 6-28-05). Applicant respectfully submits that Motoyama does not disclose or suggest invoking the program code of a service in response to an email service as claimed in amended claim 1. Instead, Motoyama teaches invoking commands in a business machine in response to an email message. (Motoyama, col. 11, line 45 through col. 12, line 58). For example, Table 2 at col. 11 and Tables 3A and 3B at col. 12 of Motoyama show commands that may be invoked in a business machine from a remote diagnostic device using an email message. (Motoyama,

col. 12, lines 38-39). It is submitted that invoking commands in a business machine as taught by *Motoyama* does not anticipate invoking the program code of a service on a device as claimed in amended claim 1 because commands to be performed by a business machine as taught by *Motoyama* are not program code to be executed on computing resources in a device as claimed in amended claim 1. (See the commands in Table 2 and the command/responses in Tables 3A and 3B of *Motoyama* at columns 11 and 12 which are clearly not software code).

It is therefore respectfully submitted that the device of amended claim 1 that invokes the program code of a service on its computing resources in response to an email message is not obvious in view of *Blair* and *Karim* and *Motoyama* - none of which disclose or suggest invoking program code on computing resources.

Given that claims 2-6 depend from amended claim 1, it is submitted that claims 2-6 are not obvious in view of *Blair* and *Karim*.

It is also submitted that amended claim 7 is not obvious in view of Blair and Karim and Motoyama. Amended claim 7 includes limitations similar to the limitations of amended claim 1 including using an email message to invoke the software code of a service on a set of computing resources in a device. Therefore, the remarks stated above with respect to amended claim 1 and Blair and Karim and Motoyama also apply to amended claim 7.

Given that claims 8-13 depend from amended claim 7, it is submitted that claims 8-13 are not obvious in view of *Blair* and *Karim* and *Motoyama*.

It is further submitted that amended claim 14 is not obvious in view of Blair and Karim and Motoyama. Amended claim 14 includes limitations similar to the limitations of amended claim 1. Therefore, the remarks stated above with respect to amended claim 1 and Blair and Karim and Motoyama also apply to amended claim 14.

Given that claims 15-16 and 18-21 depend from amended claim 14, it is submitted that claims 15-16 and 18-21 are not obvious in view of *Blair* and *Karim* and *Motoyama*.

It is respectfully submitted that in view of the amendments and arguments set forth above, the applicable rejections have been overcome.

The Commissioner is authorized to charge any underpayment or credit any overpayment to Deposit Account No. 08-2025 for any matter in connection with this response, including any fee for extension of time, which may be required.

Respectfully submitted,

Date: <u>9-28-05</u> By:____

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